

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION; AMERICAN CIVIL  
LIBERTIES UNION FOUNDATION OF  
COLORADO;

*Plaintiffs,*

v.

UNITED STATES IMMIGRATION AND  
CUSTOMS ENFORCEMENT,

*Defendant.*

**MOTION FOR ADMISSION  
PRO HAC VICE**

Case No. 1:25-cv-03271

Pursuant to Rule 1.3 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, Kyle Virgien hereby moves this Court for an Order for admission to practice Pro Hac Vice to appear as counsel for Plaintiff in the above-captioned action.

I am a member in good standing in the bar of the Supreme Court of California, and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred, or denied admission or readmission by any court. I have attached the affidavit pursuant to Local Rule 1.3.

Dated this 22nd day of April, 2025.

Respectfully Submitted,

/s/ Kyle Virgien

Kyle Virgien

American Civil Liberties Union Foundation

National Prison Project

425 California Street, 7th Floor

San Francisco, CA 94104

Phone: (415) 343-0770

kvirgien@aclu.org